

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

JUDY GARCIA-CLARA

Plaintiff

vs.

**AIG INSURANCE COMPANY PUERTO
RICO; AMERICAN INTERNATIONAL
GROUP; INC.; FRANCISCO DIAZ;
JUAN SEGUI; ZENaida FIGUEROA;
GUSTAVO SARABIA; MAYRA AYALA;
INSURANCE COMPANY XYZ; JOHN &
JANE DOE**

Defendant

CIVIL No. 15-1784 (CCC)

DECLARATION OF RICHARD JOERS

Richard Joers hereby certifies:

1. I am employed by American International Group, Inc. ("AIG") as the Head of Employee Relations Americas. I make this certification on personal knowledge, and based on my review of Company documents, and in support of AIG's Motion to Compel Arbitration and To Dismiss or Stay All Proceedings.

2. AIG offered employees of AIG and its subsidiaries in the U.S. and U.S. territories, including Puerto Rico, a dispute resolution program called the AIG Employment Dispute Resolution ("EDR") program. The announcement of the AIG EDR program was sent to all eligible, current employees hired before April 29, 2013 via-email. Employees hired on or after April 29, 2013 were automatically enrolled in the AIG EDR program upon employment. The

AIG EDR program requires covered claims, including most employment-related disputes, to be resolved through arbitration.

3. On April 29, 2013, AIG sent out an initial notification via email regarding the AIG EDR program using a list of all active eligible employees. This communication included a message from Jeff Hurd, Executive Vice President Chief Human Resources and Communications Officer, regarding this new EDR program. The communication was explicit and provided a link for the employees to review further information about the EDR program, including the program brochure and plan documents. It advised every recipient of the opportunity to elect to opt out of the program by declining participation in the EDR program, described how to exercise that option and stated the time period employees had to elect that option. Furthermore, the communication clearly expressed if the employee did not opt out by the June 30, 2013 deadline, he/she would be included in the EDR program effective July 1, 2013.

4. Based on review of the e-mail distribution list of recipients of this April EDR notification email, Judy Garcia was on that list.

5. On June 5, 2013, AIG sent a communication via-email reminding employees who received the initial communication and had not yet completed the EDR training to complete the training on EDR and of the opt-out deadline of June 30, 2013.

6. Based on review of the e-mail distribution list of recipients for the reminder email communication, Judy Garcia was also on that list.

7. Additionally, after reviewing the spreadsheet business record of employees who completed the EDR training as of December 16, 2013, Judy Garcia appeared on that list as having completed the EDR training.


8. A review of AIG's business records following the close of the opt out period demonstrated that approximately 15% of eligible employees opted out of the EDR program. Based on the business records of AIG, Judy Garcia did not opt out.

9. On September 19, 2013, AIG sent a communication via-email to all eligible employees that did not opt out of the AIG EDR program, confirming that they were covered by the EDR program as of July 1, 2013.

10. Based on review of the e-mail distribution list of recipients of the September 19, 2013 e-mail, Judy Garcia received the EDR confirmation e-mail communication.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 7, 2015


RICHARD JOERS